

IN THE DISTRICT COURT OF MARYLAND FOR WORCESTER COUNTY

STATE OF MARYLAND

\*

\* Case No.: D-025-CR-22-000939

v.

\* Trial Date: 10/24/2022

RACHOL ANNE WILLIS

\* Trial Location: Ocean City District Court

Defendant.

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**RESPONSE TO DEFENDANT'S REQUEST FOR DISCOVERY**

The State of Maryland, by and through Tori L. Rinaldi, Assistant State's Attorney for Worcester County, hereby provides the following discovery to the Defendant pursuant to Maryland Rule 4-262:

1. Exculpatory and Impeachment Information: Pursuant to Maryland Rule 4-262(d), the State shall provide to the defense any material or information in any form, whether or not admissible, that tends to exculpate the Defendant or mitigate the Defendant's guilt or punishment as to the offense charged and all material or information in any form, whether admissible or not, that tends to impeach a State's witness without the necessity of the Defendant's request. Any such information currently known to the State is contained within the discovery materials provided and will be supplemented as required.
2. Statements of Defendant and Co-Defendant(s): All written and oral statements of the Defendant and any Co-Defendant that relate to the offense charged and all material and information, including documents and recordings, that relate to the acquisition of such statements currently known to the State are contained within the discovery materials provided and will be supplemented as required.
3. State's Witnesses and Written Statements: The State may call any persons listed in the discovery materials provided as witnesses to prove its case in chief or to rebut alibi testimony in any proceeding relating to the above-captioned case. The names, addresses and known telephone numbers of these witnesses and any written statements of these witnesses are contained within the discovery materials provided.
4. Searches, Seizures, Surveillance and Pre-Trial Identification: All relevant material or information regarding specific searches and seizures, eavesdropping and electronic surveillance including wiretaps and any pretrial identification of the Defendant by a State's witness are contained within the discovery materials provided.
5. Reports or Statements of Experts: Law Enforcement Experts: The State gives notice to the Defendant of its intent to call all of the police officers, firearms examiners, latent-

print examiners and chemists (upon timely demand) disclosed as witnesses in this case to testify as experts in their respective fields. Any police officers called as witnesses will testify as experts in the identification, packaging, distribution of controlled dangerous substances; experts in the detection of intoxicated motor vehicle operators; experts in gangs and gang activity; and experts in the detection and characteristics of armed persons. Any firearms examiners will testify as experts in the identification, functioning and operability of firearms and ammunition. Any latent-print examiners called as witnesses will testify as experts in the recovery, analysis, comparison and identification of latent prints. Any chemists called as witnesses will testify as experts in the identification and analysis of controlled dangerous substances. A copy of the Chemical Analysis and Chain of Custody, which the State intends to introduce at trial without the presence of the chemist pursuant to Section 10-1003 of the Courts and Judicial Proceedings Article of the Annotated Code of Maryland is hereby provided or will be provided to the Defendant upon its receipt. The State will supplement this notice as required.

6. Evidence for Use at Trial and Property of Defendant: To inspect, copy or photograph any documents, computer-generated evidence as defined in Maryland Rule 2-504.3(a), recordings, photographs or other tangible items the State intends to use at a hearing or trial, or any items obtained from or belonging to the Defendant, which are all referenced in the discovery materials provided, please contact Legal Assistant Christin Lawson at the Office of the State's Attorney.

Dated: September 24, 2022



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## **STATE'S REQUEST FOR DISCOVERY**

The State of Maryland, by and through Tori L. Rinaldi, Assistant State's Attorney, hereby requests that the Defendant provide the following discovery materials to the State pursuant to Maryland Rule 4-262(e):

1. Reports or Statement of Experts: The State requests the Defendant provide, for each intended defense expert witness the name, address subject matter on which the expert is expected to testify, the substance of the findings and the opinions to which the expert is expected to testify and a summary of the grounds for each opinion. The State further requests the opportunity to inspect and copy all written reports or statements made in connection with the action by the expert, including the results of any physical or mental examination, scientific test, experiment or comparison and the substance of any oral report and conclusion by the expert.
2. Documents, Computer-Generated Evidence and Tangible Items: The State requests the Defendant provide the opportunity to inspect, copy and photograph any documents, computer-generated evidence as defined in Maryland Rule 2-504.3(a), recordings, photographs and other tangible items that the Defendant intends to use at a hearing or trial.

## **CERTIFICATE OF SERVICE** **MARYLAND RULE 20-201(f) CERTIFICATION**

I, the undersigned, hereby certify that on September 24, 2022, a copy of the foregoing document was delivered to Andrew V. Jezic by

- ☐ e service via MDEC to andrew.jezic@jezicfirm.com
- ☐ first class mail, postage prepaid to Jezic & Moyse, LLC, 2730 University West Boulevard, Suite 604, Wheaton, MD 20902
- ☐ fax to (240) 292-7225
- ☒ email to andrew.jezic@jezicfirm.com
- ☐ hand delivery

I, the undersigned, hereby certify that the foregoing document does not contain any restricted information or, if it does contain restricted information, a redacted submission has been filed contemporaneously pursuant to Maryland Rule 20-201(f)(2).



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Tori L. Rinaldi